

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,
*as an assignee of individuals who are
Covered Persons, JANE DOE-1, a law
enforcement officer, JANE DOE-2, a law
enforcement officer, PATRICK COLLIGAN,*

Plaintiffs,

v.

LIGHTHOUSE LIST COMPANY, LLC,
RICHARD ROES 1-10, *fictitious names of
unknown individuals* and ABC COMPANIES
1-10, *fictitious names of unknown entities*,

Defendants.

CIVIL ACTION

CASE NO. 1:24-cv-11443

**MOTION FOR PRO HAC VICE
ADMISSION OF OUT-OF-STATE
COUNSEL SUDHIR RAO, ESQ. FOR
DEFENDANT LIGHTHOUSE LIST CO.,
LLC.**

[Local Civil Rule 101.1]

To: The Clerk of Court

PEM LAW LLP

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PLEASE TAKE NOTICE that, pursuant to L. Civ. R. 101.1, Lighthouse List Company, LLC, by and through its counsel, Starr, Gern, Davison & Rubin, P.C., hereby moves before the United States District Court for the District of New Jersey for an order admitting *pro hac vice* out-of-state attorney Sudhir Rao, Esq., to appear and represent the said defendant in this action, and that a hearing on that motion is scheduled on February 3, 2025, at 10:00 a.m. or as soon thereafter as counsel may be heard, before the Honorable Harvey Bartle, III at the United States Courthouse in Camden, New Jersey.

PLEASE TAKE FURTHER NOTICE that in support of the motion, the movant relies upon the accompanying declarations of attorneys Sudhir Rao, Esq. and Ronald L. Davison, Esq.

Respectfully submitted,

s/Ronald L. Davison

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Attorney for Lighthouse List Co., LLC

Dated: January 13, 2025

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2025, the foregoing was filed electronically. Notice of this filing will be sent to the below listed attorneys of record by operation of the Court's electronic filing system, and via e-mail. The parties may access this filing through the Court's electronic filing system.

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/s/ Ronald L. Davison

Ronald L. Davison